

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

Nashville Division

RECEIVED
in Clerk's Office

SEP 15 2021

U.S. District Court
Middle District of TN

Nicol Jackson

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Kingdon Hall of Jehovah Witnesses

Jury Trial: (check one) ☒ Yes ☐ No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Nicol Jackson
Street Address	809 S Kedvale
City and County	Chicago, Cook
State and Zip Code	IL. 60624
Telephone Number	773-850-4587
E-mail Address	Msnicoljackson@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

Defendant No. 1

Name	Kigdom Hall of Jehovah Witness
Job or Title <i>(if known)</i>	Headquarters
Street Address	900 Red Mill RD
City and County	WallKill ,
State and Zip Code	New York, 12589-3223
Telephone Number	18457446000
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Kingdom Hall of Jehovah Witnesses
Job or Title <i>(if known)</i>	Headquarters
Street Address	1 King Drive
City and County	Tuxedo Park,
State and Zip Code	New York, 10987
Telephone Number	18455243000
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Watchtower and Tract Society of Pennsylvania
Job or Title <i>(if known)</i>	HeadQuarters
Street Address	25 Colummbia Heights
City and County	Brooklyn,
State and Zip Code	New York, 11201
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Kingdom Hall of jehovah Witnessesm Paris Tennessee
Job or Title <i>(if known)</i>	ELDERS: Riddick, Manns, Abindante, Garcia and Lamoureux
Street Address	1915 Lone Oak Road
City and County	Paris, Henry
State and Zip Code	Tennessee 38242
Telephone Number	731- 644-0167
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) Nicol Jackson, is a citizen of the
State of (name) Illinois.

2. If the plaintiff is a corporation

The plaintiff, (name) NA, is incorporated
under the laws of the State of (name) NA,
and has its principal place of business in the State of (name)
NA.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) NA, is a citizen of
the State of (name) NA. Or is a citizen of
(foreign nation) NA.

2. If the defendant is a corporation

The defendant, (name) Watch Tower and Tract Society (Pennsylvania), is incorporated under
the laws of the State of (name) Pennsylvania, and has its
principal place of business in the State of (name) New York.
Or is incorporated under the laws of (foreign nation) NA,
and has its principal place of business in (name) NA.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

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I am due a lifetime of relief as the Jehovah Witnesses allowed and excused their protocol for sexual assault at my expense for years, as negligence, to keep my assault confidential amongst the Jehovah Witnesses of Paris and the Governing Body of Jehovah Witnesses, as a minor and even after I was an adult.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) 03/01/1979, at (place) at 416 Powell street and field service and the kingdom hall,
the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because (describe the acts or failures to act and why they were negligent)
He sexually assaulted me from 1979 maybe....to 1984. 1985-1988, they Jehovah witnesses were aware that Clarence Teague had a propensity to "Like" kids. he admitted to fondling, penetrating (orally) or photos in 1985. His name should be on the Child Molester or sexual abuse report of 1997.

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by (explain)
not calling the police and or investigating all the "half" claims he was making. They allowed him to stay a Jehovah Witness without question, they allowed a serial rapist sexual assault serial rapist to remain in the congregation even after he admitted to trying to rape me in 1992.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am asking for 2,000,000\$ in relief. I am asking for questions to be answered by all members who stood in judgement and did not call the authorities for me in 1985 or 1992. I want to know what he could have told any of them to allow him free passage to walk this earth with no consequences for sexually assaulting a minor for years. Then I would like 2,000,000\$ as this has impacted my life beyond belief. I suffer from PTSD, it has always affected all my relationships and probably will for the rest of my life. I still have insomnia and as I stated before I am alleging that the Elders from New York and Tennessee deliberately proceeded to act consciously and intentionally disregarding the high probability of injury and proceeded to act with indifference to the probability of me being assaulted again and again and again. Following Jehovah Witness protocol caused me intentional infliction of pain for years, mental anguish and PTSD.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

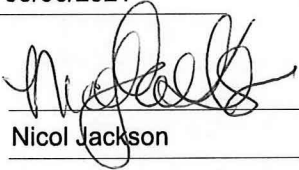
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 09/06/2021

Signature of Plaintiff

Printed Name of Plaintiff


Nicol Jackson**B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

August 5th, 2021

FROM: Nicol Jackson
809 S. Kedvale, Bsmt
Chicago, Illinois 60624
msnicoltjackson@gmail.com
773-850-4587

ATTN: Watchtower Bible and Tract Society of New York ("Watchtower NY")
Legal
1 Kings Drive
Tuxedo Park, NY 10987

ATTN: %: The Kingdom Hall of Jehovah . Witnesses, ELDERS
Pierre Lamarareaux, Russell Riddick, Phillip Manns, Brother's Abondante and Brother
Garcia? (Lone Oak Road)
1915 Lone Oak Road
Parls, TN 38242

DEMAND FOR COMPENSATION, PAIN AND SUFFERING, PTSD, EMOTIONAL DISTRESS

I am sending this demand as a way to recover damages from allegations contained herein. To date I suffer from PTSD, I am alleging I suffer not only from the abuse itself but the subsequent cover up from 1985, I am a sexual assault survivor (1979-1992) by the hands of a JW Elder, Clarence Teague and the Paris TN JW, Elders.

I am requesting punitive damages in an amount consistent with the allegations contained herein.

I am alleging that Elder Clarence Teague (Pedophile) reported these sexual assaults to the local Elders, rather than reporting such conduct to law enforcement. I am alleging that The Paris TN Kingdom hall of Jehovah witnesses controls how allegations of sexual abuse committed by members are handled. I am alleging that because the Kingdom of Jehovah Witnesses assumed there were no witnesses to the abuse there was no action taken by the Congregation, (I was never contacted even after he confessed the 2nd time). Pursuant to Child Protective Services 23Pa.C.S.A. 6311, The Jehovah Witnesses were mandated to report the Child abuse. I am alleging that in speaking with Pierre Lamareaux, Elder of Parls TN Congregation that my abuse was minimized and punishment was negligible, I was simply told, they didn't see a need to call the police. I am alleging that all these things took place when I was a minor and in 1992.. Because of the Watchtower protocol Elder Clarence Teague (Pedophile) continued to sexually abuse me. As a direct and proximate cause of such an intentional act, I suffered damages.

- I am alleging that the Elders of the Paris TV congregation acted with malice due to the JW protocols, deliberately proceeded to act consciously and intentionally disregarding the high probability of injury, and proceeded to act with indifference to the high probability of me being assaulted again and again and again. This neglect has caused intentional infliction of pain, mental anguish, and PTSD.

What I believed to be the truth then and now,

Clarence Teague was a pedophile that was a American Citizen and he lived in Paris Tn.

I was a minor from 1979-1989, 1992 was the last time he attempted to rape me...The NY and PA offices were conducting business in Tennessee. New York being the Headquarters of Jehovah Witnesses. During all times the assaults took place in Henry County, McKenzie, Murray, KY, Greenfield and Nashville and Memphis and the kingdom Hall in Paris Tn 416 Powell Street and out in Field Service. The New York office is the head of the JW's and controls the other local congregations. Everyone who 1st joins is an unbaptized publisher. Last promotion, Elder. The NY office has to approve Elders. They groom them, "feel them out" Once an Elder, they belong to the NY and PA office in some type of capacity. The division that creates the rules and regulations and bible teachings is the NY Office. It is advised to call the NY office when wrongdoing has occurred by Elders rather than law enforcement. The NY office controls all allegations of Sexual abuse, Member have been instructed not to report rape, molestation or assault to law enforcement or child protective services. The NY office does not endorse informing local authorities of child sexual assault but abides by its own process for investigation, Records were kept by the NY office, (not for sure of protocol or regulation here, but records for sexual assault should be kept indefinitely). Watch Tower Protocol allows reproof, public reproof or disfellowship. I think they tell the congregation the member is being chastised for reasons that will never be divulged to the congregation. Watchtower protocol allowed Clarence Teague, Elder, Pedophile, to stay a Elder JW. There is tolerance for child sexual abuse, in 1997, a report was requested through the NY Office for Elders to send the names of anyone in a Appointed Position who engaged in sexual abuse to be sent to them. The NY office should have a report of this incident because he reported it to Pierre Lamoareaux and all the other Elders of The Paris TN Congregation. This incident should be in the database, someone should have known to report it in 1985 and 1992 and that means Clarence Teague, Elder, Pedophile should be on that list and or report.

In 1992 I was there to pick up the Ford Escort. He wanted more pictures and to have sex. He attacked me in the car, he was fine tuning me driving the car to Chicago. He attacked me on a road. I had to pull over to let him straighten then the clutch, when he bent over me he had his pants already undone so when he walked up his penis met my face...he tried to force himself on me BUT he had to masturbate, he was holding my head...i told him if he stuck anything to close to my mouth i was going to bite it off and swallow it...but he ended ejaculating "close to my mouth, he had my headband i was still in my seat bett...I left Paris and drove straight back here. We lived at 1732 N Kimball..me my mama, my sisters and me. In 1989 I had my first after the facts sexual relationship and move din with this person. He will attest tot he things and behaviors I had with him...

Clarence Teague was a Deviant Pedophile. He had me do things that I know now, he was not sane. Clarence Teague used to have me babysit Pierre Lamareaux Son, Phillip, so that he could take pictures of my breast while he licked the baby milk off me. He never touched lil Phillip. he just would come to their house after Phillip went to sleep and make me do crazy things. I didn't start babysitting for The Lamoreaux until lil Phillip was maybe 6 months, I was 12-14 years old by then, Phillip was a beautiful red headed baby, but he was a sickly Premmie and Cheryl was a little sickly too....Clarence Teague raped, intimidated, lied, manipulated, and hurt me physically, mentally, psychologically. Never verbal because he always told me "grown stuff" that started when I was 7 or 8 years old. I went to live with Antie and her husband, Clarence Teague in 1979, when I was 8 years old. He started abusing me maybe when we first got there but real soon after. I was 7, my sisters were 2. I was 9, they were 5. I was 12 and they were 7. In 1983, my sisters were my age. I had to protect them. I had 2 little sisters to protect. I was 14 in 1985, they were 9 years old. If he touched one, someone should have assumed he was abusing all of us.

It, Is very Important you understand that my drlnkng started In 1984., I started drinking Grain 100% Proof alcohol. I suffer from severe PTSD, Anxiety, Guilt, undescribable embarrassment, nightmares, insomnia and i am extremely scared of the dark, (I do not sleep in the dark) this hindered my marriage, my sex life, the way I raised my kids, it IS hindering my present relationship. This has affected my life and will continue to affect my life for the rest of my life.

I must start from the latest events to get you to understand how this demand letter even came about:

I put myself In a treatment center 2020, #1 cause my drlnkng had become unmanageable and I was totally out of control, always have been but I was drlnkng and that was always the way I dealt with everythng. Alcohol made me black out or got me damn near close. It has been my frlend since 1984. It was then, I thlnk "Tlann" started helping me get through the shltz. ..I was barely a hlgh schooler. I started smoking weed at 14...15 maybe. Because I was growng, developng; rather, I was gettng hlalr and I was fillng out, thls made shlt worse because Elder Clarence Teague (Pedophile) got obsessed wth my body and who I mlgth sneak and be wth. So I started gettng grounded (always stuck In the house for months wth hlm) I was In the house most of that year and that's when It was dlscussed I would be a young ploneer and do more hours In field servlce. I'm not sure who came up wth that but stuff got worse because I was always at home, out In field servlce or at the kngdom hall, more and more on cleanng weeks. I thlnk It was cleanng . Because some weeks would be worse at the kngdom hall than others. There were breaks.

Belng In thls treatment center I was able to get a psychlatrlst, a theraplst and or a psychologlst. I decided to sklp around on the 12 steps cause I felt I needed to make amends In order for me to even begln to heal and be slncere and malntaln my sobrlty. So I started wrltng letters to my slsters, who I apologlzed to for my behavior ever slnce they can remember. I actually thought all these years that maybe...maybe...BUT I HOPED PRAYED NOT..that he dldn't touch them. All these years I never spoke to them. I prayed I kept them safe and untouched but I also

thought maybe I went through all that and he still was the sick bitch and maybe he had tricked me and had actually got hold of one of them. All these years I started thinking, maybe they crazy too...maybe they were keeping this sick bitch secret and maybe just maybe he DID get them...so over the years because I never spoke to them about it, I started drinking more...more...more. My little sister used to associate the "clear water by the tree" as water. When he used to tell us we had to sleep in our own rooms Meka would ask me if I was going to drink the water by the tree. She was real nosy then...always everywhere at once, paid attention to everything just couldn't be still. I then wrote my mother a letter and told her I finally forgave her. Because I felt she just abandoned us and never checked on us and I just hated her. We actually got into a fist fight cause I didn't trust her as a mother to chastise me. NO! She sent me to a pedophile and I let her know it all the time. So I wrote my mom and told her I forgave her, I told her I felt she did everything she could when she found out and I loved and forgave her. Its been a few more months now...I am presently still in my sobriety at this moment and my next step to make amends was to take a road trip and make things right with my Aunt and my grandmother. My grandmother, my mama and grandmother were the 1st person I spoke to in 1992. she said she had something to tell me before she said anything and to listen to her, she told me "no matter what happened, my Aunt is her daughter and she is the only hurt at this moment. She is a Jehovah Witness and she will not get divorced. I'm not there, I left it ok, don't make things worse for my Aunt". I asked to speak to my Aunt, cause my grandmother never told me WHY she said that to me. I asked for My Aunt, she told me she was lying down and that she couldn't talk, I asked my Grandmother what SHE was talking about she said...your uncle told me he made a mistake and she was handling it. I asked her handling what? She said he said he touched you. I told my Grandmother that day..he raped me over and over what do you mean my aunt ain't gonna leave him? Huh? Let me speak to her. I finally got to speak to my Aunt one day....she didn't say too much, my grandmother had really kinda cut me off. She needed me cook but that was about it. She kinda let me go after that..but it was told to me he was disfellowshipped and had to go to jail. That's what my mother told me. That's what my mother was told. I have believed that all these years. So it's time to make amends, I called the JW headquarters to just check and see if a real fa real I owed my Aunt and grandmother a apology for my behavior to them...I said some stuff needed to be said, and my grandmother never really messed with me again but she never outright came to me and told ME that's what happened. She never spoke with me with my aunt or my mother in the same room. I never questioned why they never spoke to me cause I figured since he had to do jail time, the JW disfellowshipped him and had him locked up. Then he came forward to the police and he went to work during the day and went to jail at night at the county jail. Then he lost his leg and died. So I called them and the person who answered the phone totally disregarded anything I said to him. He asked me to repeat myself and I asked him to speak with the attorney department cause at first he tried to dismiss me with "we can't help you here". I told him, " well since he could only tell me NO please take my name the reason I was calling and have someone who could tell me yes tell me no...he told me to hold. Someone from the attorney office picked up, I explained I was calling just to verify that Elder Clarence Teague (Pedophile), an elder of a congregation in Paris TN was disfellowshipped and arrested. After I explained why I was calling he advised me to call the kingdom hall where the incident happened. I said "Incident, "? He said he could not give me any information and to call them. I called them and left them a message. Pierre Lamaroux

returned my call. I asked him if my grandmother had anything to do with my uncle being disfellowshipped and arrested? He said, "no, she didn't do anything or say nothing".

That my auntie husband told them what happened and he wasn't disfellowshipped because he repented. I asked him, "well was he arrested? Pierre said, "no". I asked why not he said because when you repent you don't get disfellowshipped because they believed he believed he repented and he didn't get arrested because at the time the law didn't require they call me or the authorities... they didn't see that a crime had been committed that warranted him getting arrested. I asked Pierre why he didn't reach out to me to ask me what had happened, he knew we lived there for years, I asked, "did you think he just touched me once, repented to what? He said, "his sins", I said, "WHAT did he repent to? You never thought to call my auntie and get me here since he was confessing? Did he repent to raping me? Did he repent to sodomy? Did he tell you he had sex with me in the kingdom hall? How many times he made me have oral sex?" Pierre said, "no". I asked why they didn't call the police, he said "because Clarence turned himself in to the elders and what he told them wasn't a crime." I asked him, "why they didn't call me or get in contact with me?" He said, "because at the time when he repented they didn't have to contact me, cause he repented." I asked him well why you didn't ask me... Pierre said the law did not require it at the time and I responded that if you woulda contacted me you would have thrown away the keys to the jail. He woulda been gone for YEARS! He apologized and said he repented and they allowed my auntie husband to turn himself in... LIES! Cause I woulda told them he raped me... sexually assaulted me, molested me as a young girl. Pierre apologized. Hung up, I called my sister and ran stuff by her. She told me the same thing I had known was true: he went to jail. Thus; this demand is to the Jehovah Witnesses of Paris for pain and suffering and a lifelong time of PTSD and the Jehovah Witnesses of New York. They let an Elder get away with rape. I allege Elder Clarence Teague (Pedophile) confessed to Tony Garcia and Elders in 1985. Tony Garcia, an Elder and husband of my Aunt's BEST friend, Charlotte. I also allege Elder Clarence Teague (Pedophile) touched Christie Patterson, maybe Jason Garcia... I can't find Christie and Jason killed himself. Christie disappeared while we were still there. The Garcia's and the Patersons cut us off... so my Auntie husband started taking me to MaKenzie.

I am alleging that Clarence Teague sexually assaulted me from 1979 -84. 85-88. And attempted to rape me 1992. I am alleging he confessed the 1st time in 1985, right after the SuperBowl and I am alleging that the Jehovah Witnesses had knowledge and chose to allow this assault to happen repeatedly due to the Jehovah Witnesses belief. In 1984, I got my first yeast infection when I came here from Paris to my grandma Isabella house on Independence and polk. I also contacted crabs 1985 (as soon as we got back) This was a rumor at school and Christie had asked me if I had them. Elder Clarence Teague asked me if my Poly was itching bad. I told him yes. I didn't know what a crab was until he said he had to help me before my auntie found out, said if she found out she would sit me in boiling hot water enough to burn my skin off because she would know I had sex with someone. He combed them out. I had just started getting pubic hair. This was the first time he half penetrated me. I was 14. He waited until I was 16 to get me to have sex WITH him after the first intercourse behind the Kingdom hall, he just started taking me more and more. In the kingdom hall, out in field service.

As evidence I will submit:

- 1.) Contact Info for: Mother, Patrice Ammons, Pam Teague, (Wife of Elder Clarence Teague (Pedophile), Maternal kln), My Aunt Mary (Paternal kln), Auntie Jackle (paternal kln) and Nicole (maternal marital kln), Uncle Stefan (Maternal kln)
- 2.) Medical Records Release from Psysh: I am presently on Psychotropic drugs

3.) Potential Witnesses of Jehovah Witnesses:

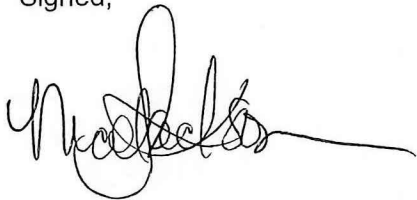
The Jehovah Witnesses Involved In the decision making of my being sexually assaulted (1992): Pierre Lamaroux, Russell Riddick, Phillip Manns, Brother's Abondante; Elder from the Paris Tennessee Congregation. Russell Riddick, (1985) Tony Garcia (1985), Charlotte Garcia, (1985) David Patterson (1985), wives included.

I am alleging that the Jehovah Witnesses had specific knowledge and or knew or should have known of the dangerous yearnings of Elder Clarence Teague (Pedophile), I am alleging and willing to prove that on 2 separate occasions the Jehovah witnesses became aware of improper acts and sexual assault between myself, a minor, but negligently failed to take reasonable and appropriate measures to the authorities due to Jehovah Witness Protocol.

The purpose of this DEMAND letter is to hold everyone accountable for the pain and suffering I endured due to negligence, I feel I am owed a few answers and I feel the JW are obligated to answer my questions and compensate me for all I had, have and will continue to endure due to their protocol malicious negligence. I could have been helped years ago when he first told on himself for either me, Christie or Jason, in 1985.

I would also like to know what he repented to? Cause in 1979-80 during the "Cambridge Diet era" he groomed me.. 1980-83 he molested me. 84-88 he sexually assaulted me (we left 84 and came back 85, that was the only break I had). 1992 he tried to rape me again. I am expecting a response within the next 30 days of this letter.

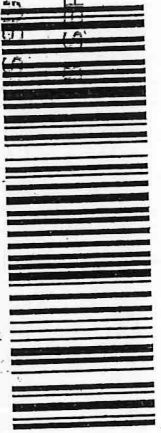
Signed,

A handwritten signature in black ink, appearing to read "Nicol Jackson", with a long horizontal flourish extending to the right.

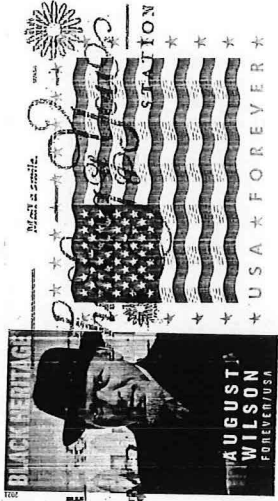
Nicol Jackson

Nicol Jackson
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Chicago IL 60624

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U.S. District Court
Middle District of TN

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SEP 15 2021

37203-366500



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JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Nicol Jackson

(b) County of Residence of First Listed Plaintiff Cook
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
-NA- Pro SE

DEFENDANTS

Jehovah Witness

County of Residence of First Listed Defendant Ulster County
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

III. Rev. Stat. ch. 735, § 13-202, § 13-202.2(b)

Brief description of cause:

Sexually assaulted as a minor by Jehovah Witness from 1979-1988 and sexually assaulted 1992

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
\$2,000,000

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE NA

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

NA

NA

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____